EXECUTIVE SUMMARY AND RESPONSE TO COMMENTS

Title V/PSD Draft Permit No. V-03-051
RECMIX OF PA, INC.
GHENT, KENTUCKY
May 28, 2004
WILSON TAN, REVIEWER
Plant I.D. # 21-041-00042
Application Log # 56071

Recmix submitted a Title V/PSD permit application. Recmix itself is a minor source; but, because it plans to take over the North American Stainless (NAS) slag processing operation (part of the NAS PSD permit application), a Title V/PSD permit is required.

A preliminary determination was made to approve the permit, and a public notice was placed in The News-Democrat on January 7, 2004. The comment period expired on February 6, 2004 and no comments were received from the public, affected states or EPA. Comments were received from the company and North American Stainless. This permit is the proposed permit under the Title V program, and shall become the final Title V permit unless EPA files an objection.

In conclusion, a thorough analysis has been made of all relevant information available which pertains to this application. The Division has concluded that the source will comply with all applicable air quality regulations and requirements. Compliance with the terms of the permit will ensure compliance with all air quality requirements. Therefore, it is The Division's final determination that a Title V permit should be issued as conditioned.

Response to Comments:

Company Comment:
Enclosed is the proposed permit language for the Recmix Permit, relating to the compliance demonstration for stockpile moisture content and tonnage.

"Compliance with the permitted emissions for the final aggregate stockpiles will be demonstrated by the measurement of the moisture content of the final aggregate which accumulates in the stockpiles. Representative samples of the final aggregates will be collected quarterly and the moisture content determined. The moisture content will be measured as a percentage of the dry weight. Compliance with the estimated emissions will be demonstrated if the moisture content is equal to or greater than 12%. Recmix will retain the record of the moisture content analysis in the facility records and will provide the data to the DAQ for inspection upon request."

"Compliance with the maximum inventory of final aggregate used to estimate emissions for this permit will be demonstrated by the following method:

A. Recmix will maintain records of the density of the final aggregates generated from the wet dressing plant. The testing will be performed on representative samples of final aggregates and be performed at least once per year.
B. The volume of final aggregate stockpiles in the operating area of the Recmix facility will be determined by estimating the length, width and height of stockpiles. The volume, expressed in cubic feet or cubic yards, shall be determined from the field measurements performed.
   The estimated tonnage of final aggregate stockpiles controlled by Recmix will be determined by multiplying the estimated volumes by the density of the final aggregate from the available testing data maintained by Recmix.
C. The estimated tonnage of the stockpiles will be compared to the 20,000 ton maximum values utilized to estimate emissions from the facility. Compliance will be demonstrated if the tonnage of the final aggregate stockpiles is less than 20,000 tons.
D. If necessary, and at the discretion of Recmix, the final aggregate stockpiles may be surveyed, to more accurately determine volumes, for purpose of estimating tonnage and demonstrating the amounts on-site are less than 20,000 tons."

Response:
The Division concurs and similar language has been incorporated into the permit (page 3 of 15).

Division Comment:
- Previously, the Division used an emission factor that accounts for both material piling and wind erosion. Recmix suggested that the Division use the material piling emission factor from AP-42 - Aggregate Handling and Storage Piles (Section 13.2.4), and wind erosion emission factor from AP-42 – Industrial Wind Erosion (Section 13.2.5).
- Using both the new emission factors, the plant-wide calculated actual and Potential-To-Emit (PTE) for Particulate Matter emissions have decreased.
- A new emission point was created and named Wind Erosion (Emission ID = Area3).
    - Appropriate limitation, monitoring, recordkeeping, and reporting requirements were added.

- Emission calculation was based on the assumption that the stockpiles will be conically shaped, a slag density of 1.5 tons per cubic yard, and a maximum of 20,000 tons of final aggregate at any time.

Company Comment:
Page i of ii AREA3 Wind Erosion, change the language "slag aggregate stockpiles" to "final aggregate stockpiles".

Response:
The Division concurs and has made the change in the permit.

Company Comment:
Revise the condition L-5 (page 1 of 15) language "The slag aggregate stockpiles weight < 20,000 tons" to "The final aggregate stockpiles weight < 20,000 tons".

Response:
The Division concurs and has made the change in the permit.

Company Comment:
The reference to "or testing" on page 2 of 15, condition M-3 should be deleted. The emissions sources are all fugitive emissions and do not have stacks.

Response:
Recmix is required to do slag and final aggregate moisture content analysis quarterly to show compliance. The Division concludes that no changes shall be made.

Company Comment:
What are the applicable emission points for condition R-2, page 3 or 15?

Response:
The applicable emissions points are Raw Slag Handling (EQPT1), Oversize Slag Handling (EQPT4), Slag Skull Handling (EQPT8), and Crushing Operation (EQPT12).

Company Comment:
For condition R-4 on page 4 of 15, the applicable emission points are the unpaved roadways in the vicinity of the slag processing plant, the slag skull handling, and the crushing operations. A log of the dates of operation and the operation of the water sprays will be noted in a logbook.

Response:
The Division concurs and the application emissions points shall be Unpaved Roads (Area1), Slag Skull Handling (EQPT8), and Crushing Operation (EQPT12).

Company Comment:

The condition S-4 and S-5 on page 6 of 15 should be deleted. Performance testing and reporting is not practical or necessary for these fugitive emission sources.

Response:
Recmix is required to do slag and final aggregate moisture content analysis quarterly to show compliance. The Division concludes that no changes shall be made.

Company Comment:
For condition T-2 on page 7 of 15, the sentence "In addition, the materials processed at each unit listed above shall be controlled with wet suppression and/or enclosures…", should be revised to "In addition, the materials processed at each unit listed above shall be controlled with wet suppression and/or enclosures for ID EQPT1, EQPT2, EQPT8, and EQPT12….".

Response:
The Division concurs and revised the language "each unit listed above" to "EQPT1, EQPT2, EQPT3, EQPT4, EQPT8 and EQPT12". Additional limitations were added into the condition T-2 on page 7 of 15.

North American Stainless Comment:
A maximum emission rate of 0.78 tons per year as based on the Recmix's permit application and air dispersion modeling should be the permit limit.

Response:
The Division concurs and has made the changes in the permit.